



TERESA JORDAN
3152 SHAD COURT
SIMI VALLEY, CA 93063
TELEPHONE NO. (805) 522-5016

TO: Ms. Cassandra Owens
LARWQCB
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

FAX NO.: (213) 576-6640

DATE: April 14, 2009

NO. OF PAGES: 4 (includes cover sheet)

RE: Tentative Amendment to WDRs &
Tentative Cease and Desist Order -
Boeing SFL NPDES Permit
No. CADD 309, CI No. 6027.

3152 Shad Court
Simi Valley, CA 93063
April 14, 2009

Ms. Cassandra Owens
LARWQCB
320 W. 4th Street, Suite 200
Los Angeles, CA. 90013

Re: TENTATIVE AMENDMENT TO WASTE DISCHARGE REQUIREMENTS
AND TENTATIVE CEASE AND DESIST ORDER - THE BOEING
COMPANY, SANTA SUSANA FIELD LABORATORY, CANOGA PARK,
CA, NPDES NO. CA0001309, CI NO. 6027.

Dear Ms. Owens:

I am opposed to the aforementioned item for the
following reasons.

GENERAL COMMENTS

- #1 - Contamination from the SSFL has for years impacted the City of Simi Valley's NPDES Permit since the site's northern runoff provides the "headwaters" for the Calleguas Creek in this watershed area.
- #2 - The contamination impacts from the SSFL have for years impacted the "Calleguas MS4 permittees", and the "Malibu MS4 permittees" pocketbooks.
- #3 - The extensive cleanup will not lead to full compliance with the requirements of SB 990.
- #4 - The SSFL will not be listed by the Governor as a USEPA Superfund site.
- #5 - I do not agree with The Boeing Company's 2008 LARWQCB Water Quality Control Basin Plan Triennial Review comments.
- #6 - The DTSC rescinded the approved use of Area IV SBA soils for use as clean backfill at the SSFL.

- #7 - The facility's RCRA RFI Groups documents are not comprehensive, nor complete.
- #8 - An employee of the Groups Reports in a Conference presentation(around 2002?) was given in order to help stakeholders not protect the environment.
- #9 - Future activities on the property are unknown.

MARCH 9, 2009 COMPLETED ROWD(Pages 1 to 64 of 64)

- #1 - There were many missing pages.
- #2 - Page 10 of 64, I have concerns over the statements "The Expert Panel has been convened and has recommended a system of natural and engineered BMPs for both outfalls"--008 and 009 that were "grouped" together with outfalls 003 to 010--"Some of the BMPs are now in construction but others cannot be completed at this time due to the need to obtain a modification to the Special Use Permit for SSFL from the County of Ventura. Ventura County has determined that the modification of the Special Use Permit is an action subject to review pursuant to the California Environmental Quality Act(CEQA). Boeing is proceeding with an application for the Special Use Permit modification required for the ENTS project and Ventura County will be conducting the appropriate CEQA review".
- #3 - Page 13 of 64, it is stated that "Boeing requests that the constituents listed by outfall location in Table 4 be removed from the monitoring and reporting program as these constituents have not been detected in monitoring data since 2004 by outfall location. Boeing also requests that the constituents listed by outfall location in Table 5 be removed from the monitoring program since monitoring data collected since 2004 shows that these constituents were never detected above water quality standards by outfall location. For these reasons, Boeing requests that each outfall be listed separately in the permit and in the analysis required in the monitoring and reporting program."

TENTATIVE ORDER NO. R4-2009-00XX

#1 - Pages 4(bottom) and 5(top), it is stated that "In the future, Boeing plans to treat effluent from SSFL groundwater remediation operations in either a mobile or fixed hazardous waste treatment unit operating under DTSC Permit-By-Rule requirements".

Ms. Owens, after reading the Water Boards' 2007-2008 Annual Enforcement Report, and the 2008 Accomplishments Report, I cannot support the SSFL's NPDES Permit.

Sincerely,

A handwritten signature in cursive script that reads "Mrs. Teresa Jordan". The signature is written in dark ink and is positioned above the printed name.

Mrs. Teresa Jordan